



WHISTLE-BLOWING POLICY

This policy was reviewed on:	2 nd November 2023
Date to be reviewed:	2 nd November 2025
Signature of person responsible:	M. Wittenberg
Name of signatory:	Michelle Wittenberg
Role of signatory:	Manager



POLICY STATEMENT

KEF is committed to the highest standards of transparency, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental condition of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act 1998 gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The Company has endorsed the provisions set out below to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

PROCEDURE

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

This policy is designed to enable any staff member to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

This policy is designed to offer protection to those employees of Kef who disclose such concerns provided the disclosure is made in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.



KEF will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Individuals are encouraged to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but will be considered at the discretion of KEF. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual.

In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the Manager of the programme.

Complaints of malpractice will be investigated by the Manager unless the complaint is against the Manager, in which case the complaint will be passed onto the Trustees of KEF directly.

Complainants are entitled to bypass the line management structure and take their complaints directly to the Trustees. Should the Trustees feel that the management can more appropriately investigate the complaint without any conflict of interest, the Trustees have the right to refer the complaint back to management.

If there is any evidence of criminal activity, this should be reported promptly to the police, and ensure that any internal investigation does not hinder any formal police investigations.

Due to the varied nature of complaints, no precise timescales are predicted for any investigations. However, it will be ensured that investigations are undertaken as quickly as possible without affecting the quality and depth of any investigations.

All concerns will be marked confidential and confirmed in writing to the complainant, and outcomes also confirmed in writing, including proposed plans of action.



INVESTIGATING PROCEDURE:

- Full details and clarifications to be obtained.
- Member of staff against who a complaint is being made should be informed. This member of staff will be informed of their rights to be accompanied by a work colleague or trade union colleague, or an alternative representative, to any meetings.
- Management should consult with Trustees and keep police informed if appropriate.
- Allegations should be fully investigated
- A judgement concerning the complaint and its validity will be made, detailed in a written report, and passed on to the Trustees.
- The Trustees will decide what action to take. If the complaint is justified, disciplinary or other procedures should be invoked.

If the complainant is not satisfied that the Manager is dealing with their concern properly, they have the right to raise it in confidence with the Trustees.

STAFF DEVELOPMENT

All staff will be inducted into the contents of this Policy.